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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Referral: Hon. Susan van Keulen, USMJ

PATRICK CALHOUN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-05146-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is Google LLC's Administrative Motion to Seal ("Motion") portions of the Joint Status Report Pursuant to *Brown* Dkt. No. 830 and *Calhoun* Dkt. No. 960.

Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to Be Sealed	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
Joint Status Report Pursuant to <i>Brown</i> Dkt. No. 830; Joint Status Report Pursuant to <i>Calhoun</i> Dkt. No. 960	GRANTED as to the portions at: Pages 1:11-12, 1:14, 1:23, 1:25, 1:28, 2:1-3, 2:5-6, 2:9-10, 2:13-15, 2:18-19, 2:24, 3:5-9, 3:12, 3:19, 4:3-6, 4:8, 4:16, 4:27, 5:2, 5:13, 5:27, 6:13-14, 6:16-22, 6:24-28, 7:1-2, 7:7, 7:9, 7:12	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
Exhibit 1 to Trebicka Declaration – Jan. 10, 2023 <i>Brown</i> Hearing Transcript	GRANTED as to the portions at: Pages 7:15-16, 8:9-10, 8:18, 8:21-22, 9:2-3, 9:5, 9:25, 12:5, 12:18, 12:25, 13:4, 15:16-18, 15:25, 16:8, 16:11-12, 17:6, 17:8, 18:6-10, 18:13-16, 18:18, 19:17-18, 20:11, 21:23-24, 22:25, 26:10, 28:10, 28:21-22, 29:1-2, 29:4-7, 29:10-11, 29:16, 30:4, 31:23, 34:22-24, 35:19, 35:22-23, 35:25	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing

		products, time strategic litigation, or otherwise unfairly compete with Google.
Exhibit 2 to Trebicka Declaration – Jan. 26, 2023 Letter to <i>Brown</i> and <i>Calhoun</i>	GRANTED as to the portions at: Pages 1-6	The information requested to be sealed contains non-public, sensitive confidential business information related to Google’s internal technological systems that could affect Google’s competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google’s internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential information reveals Google’s internal systems and operations. Public disclosure of such confidential information could affect Google’s competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
Exhibit 3 to Trebicka Declaration – Jan. 28, 2023 Letter to <i>Brown</i> and <i>Calhoun</i>	GRANTED as to the portions at: Pages 1-3	The information requested to be sealed contains non-public, sensitive confidential business information related to Google’s internal technological systems that could affect Google’s competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google’s internal projects and internal databases, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential information reveals Google’s internal systems and operations. Public disclosure of such confidential information could affect Google’s competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
Exhibit 4 to Trebicka Declaration – Jan. 30, 2023 Letter to <i>Brown</i> and <i>Calhoun</i>	GRANTED as to the portions at: Pages 1-4	The information requested to be sealed contains non-public, sensitive confidential business information related to Google’s internal technological systems that could affect Google’s competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google’s internal projects, internal data sources, and their proprietary functionalities, which Google maintains as

		confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
Trebecka Exhibit 5 – Jan. 10, 2023 <i>Calhoun</i> Hearing Transcript	GRANTED as to the portions at: Pages 5:25, 6:2, 6:4, 6:13, 8:1, 8:3, 17:11, 18:20, 18:25, 19:1-2, 21:1, 21:22, 22:21, 25:5, 25:17, 25:20, 25:23, 26:4, 26:8-10, 26:16-17, 28:1	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects and internal databases, as well as internal metrics, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
Trebecka Exhibit 6 – Jan. 23, 2023 Correspondence	GRANTED as to the portions at: Pages 1, 3-4	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects and internal databases, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.

SO ORDERED.

DATED: _____

THE HONORABLE SUSAN VAN KEULEN
United States Magistrate Judge